

REMARKS

This is intended as a full and complete response to the Office Action dated February 27, 2006, having a shortened statutory period for response set to expire on May 27, 2006. Claims 42-64 are pending in the application. Please reconsider the claims pending in the application for reasons discussed below.

Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner rejected claims 42, 50, 60, 62 and 64 as being obvious over *Simpson* '532 in view of *Clark* '630 and the pre-grant publication '704 to *Jackson*. In response, Applicants have amended claims 42, 50 and 62. Additionally, Applicants respectfully traverse the rejection of claim 60. Further, Applicants have cancelled claim 64.

As amended, claim 42 includes the limitation of a sleeve member disposed between the roller and the shaft. The combination of *Simpson*, *Clark* and *Jackson* does not disclose this limitation. Rather, *Simpson* discloses an expander tool having a bearing at each end of a roller, wherein the bearings are configured to allow the roller to rotate in the expander tool. (See *Simpson*, col. 6, lines 50-55) *Clark* discloses a tool having an expander that is configured to rotate on a spindle. (See *Clark*, col. 2, lines 30-35) *Jackson* fails to cure the deficiencies of *Simpson* and/or *Clark*. As amended, claim 50 includes the limitation of a first bearing member having at least one projection configured to mate with at least one depression formed in the roller. The combination of *Simpson*, *Clark* and *Jackson* does not disclose this limitation. Rather, *Jackson* discloses a washer attached to a surface using pins, as admitted by the Examiner, before it rubs against another surface. *Simpson* and *Clark* fail to cure the deficiencies of *Jackson*. As amended, claim 62 includes the limitation of substantially preventing the expansion assembly from tilting back relative to the expander tool during expansion of a tubular body. The combination of *Simpson*, *Clark* and *Jackson* does not teach or disclose this limitation. In fact, there is no mention in the combination of *Simpson*, *Clark* and *Jackson* about the prevention of the expansion assembly from tilting relative

to the expansion tool during the expansion of a tubular body. Claim 60 includes the limitation of an expansion assembly having a housing, wherein an outer diameter portion of the housing includes at least a portion disposed at either end thereof having an outer surface for contacting an inner surface of the recess, the portions having substantial width to prevent tipping of the piston in the recess. As discussed above, the combination of *Simpson*, *Clark* and *Jackson* does not teach or disclose the prevention of tipping of the piston in the recess during the expansion of a tubular body.

As the foregoing illustrates, the combination of *Simpson*, *Clark* and *Jackson* fails to teach or disclose all the limitations of claims 42, 50, 60 and 62. This failure precludes the combination of *Simpson*, *Clark* and *Jackson* from rendering claims 42, 50, 60 and 62 obvious. Therefore, Applicants respectfully request the § 103(a) rejection of claims 42, 50, 60 and 62 be removed and the allowance of the same. Additionally, since claims 43, 45-46, 49 and new claim 67 depend from claim 42 and claims 51-52, 54-57 and 59 depend from claim 50 and claim 61 depends from claim 60, these claims are allowable for at least the same reasons as claims 42, 50 and 60.

The Examiner rejected claims 47 and 48 as being obvious over *Simpson* '532 in view of *Clark* '630 and *Jackson* '704 as applied to claim 46 above, and further in view of the pre-grant publication '769 to *Whang*. Applicants respectfully traverse the rejection. As set forth above, the combination of *Simpson*, *Clark* and *Jackson* fails to render claim 42 obvious. *Whang* fails to cure the deficiencies of the combination of *Simpson*, *Clark* and *Jackson*. This failure precludes the combination of *Simpson*, *Clark*, *Jackson* and *Whang* from rendering claims 47 and 48 obvious. For these reasons, Applicants submit that claims 47 and 48 are in condition for allowance and respectfully requests withdrawal of the § 103(a) rejection.

The Examiner rejected claim 58 as being obvious over *Simpson* '532 in view of *Clark* '630 and *Jackson* '704 as applied to claim 50 above, in further view of the WIPO document '728 to *Simpson et al.* Applicants respectfully traverse the rejection. As set forth above, the combination of *Simpson*, *Clark* and *Jackson* fails to render claim 50 obvious. *Simpson et al.* fails to cure the deficiencies of the combination of *Simpson*, *Clark* and *Jackson*. This failure precludes the combination of *Simpson*, *Clark*, *Jackson*

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and *Simpson et al.* from rendering claim 58 obvious. For these reasons, Applicants submit that claim 58 is in condition for allowance and respectfully requests withdrawal of the § 103(a) rejection.

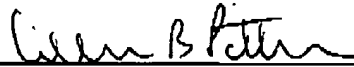
Allowable Subject Matter

The Examiner objected to claims 44 and 53 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In response, Applicants have rewritten claim 44 as new claim 65. Therefore, Applicants believe that new claim 65 is in condition for allowance. Applicants have also corrected antecedent basis issues in new claim 65. Further, new claim 66 depends from claim 65 and this claim is allowable for at least the same reasons as new claim 65. Additionally, claim 53 depends from claim 50 and this claim is allowable for at least the same reasons as claim 50.

Conclusion

The references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed. Having addressed all issues set out in the office action, Applicants respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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